

Remarks

Claims 3-5, and 27-36 are pending in this application. Reconsideration and allowance are requested in view of the above amendments and the remarks below. Applicant does not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application.

Claims 1, 3-5, and 27-36 are rejected under 35 U.S.C. §103(a) over Bhoj et al. (US Patent No. 6,742,016), hereafter “Bhoj,” in view of Roberts et al. (US Patent No. 6,754,693), hereafter “Roberts.” Applicant submits that the rejection under 35 U.S.C. §103(a) is defective because Bhoj and Roberts, taken alone or in combination, fail to disclose each and every feature of the claimed invention.

Regarding independent claim 3, the Examiner admits that Bhoj does not teach or suggest “a program for automatically executing said second connection again after a predetermined time interval.” (Examiner’s Answer at page 4). Applicant agrees. Applicant further submits that Bhoj fails to teach or suggest, *inter alia*, “wherein the connection managing unit transmits a program to the first client, wherein the first client terminal executes the program, and wherein execution of the program by the first client terminal causes the second connection request to be automatically executed again by the first client terminal after a predetermined time interval.” (Independent claim 3 as amended herein).

To remedy this glaring deficiency in Bhoj, the Examiner relies on the disclosure of Roberts. In particular, the Examiner asserts that “Roberts teaches wherein a program for automatically executing said second connection request again after a predetermined interval ... is transmitted to said client terminal to which said order of connection has been set. (Examiner’s Answer at page 4). In support, the Examiner cites to column 1, lines 40-50, column 5, lines 20-32, column 15, lines 8-21 and lines 61-67, column lines 7-38 and column 16, lines 40-67. (*Id.*). Applicant respectfully disagrees with the Examiner’s analysis of Roberts and submits that the Examiner has misinterpreted the teachings of Roberts, the claimed invention, or both.

Applicant submits that the sections of Roberts cited by the Examiner, as well as Roberts taken as a whole, do not disclose, *inter alia*, “wherein the connection managing unit transmits a program to the first client, wherein the first client terminal executes the program, and wherein execution of the program by the first client terminal causes the second connection request to be automatically executed again by the first client terminal after a predetermined time interval.” On the contrary, none of the applets in Roberts provides this functionality. For example, Roberts’ user applet 22 and service applet 30 are not used to automatically execute a second connection request after a predetermined time interval. (Independent claim 3). Rather, Roberts’ user applet 22 and service applet 30 are used to visually communicate queue information between a server 20 and a user computer 12. (Roberts at, for example, column 5, lines 34-39; column 7, lines 36-50; column 15, lines 18-21).

Accordingly, Applicant submits that claims 3-5, and 27-36 are allowable.

Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Examiner's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Examiner's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Examiner's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

Should the Examiner require anything further to place the application in condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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